

EXHIBIT 1

Declaration of Laura E. Goolsby in Support of Venue for
Class Action Complaint Pursuant to Civil Code § 1780(d)

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9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 ALANA GUTIERREZ, individually,
12 and on behalf of a class of similarly
situated individuals,

13 Plaintiff,

14 v.

15 ABBOTT LABORATORIES, an
Illinois corporation,

16 Defendant.
17
18
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Case No.:

**DECLARATION OF LAURA E.
GOOLSBY IN SUPPORT OF VENUE
FOR CLASS ACTION COMPLAINT
PURSUANT TO CIVIL CODE §
1780(d)**

DEMAND FOR JURY TRIAL

DECLARATION OF LAURA E. GOOLSBY

I, Laura E. Goolsby, declare under penalty of perjury as follows:

1. I am an associate with the law firm of Capstone Law APC and am admitted to practice in California, including within the Eastern District of California. I make this declaration based upon my personal knowledge except as to those matters stated herein that are based upon information and belief, and as to those matters, I believe them to be true. I am over the age of eighteen, a citizen of the State of California, and counsel for Plaintiff in this action.


2. Pursuant to California Civil Code §1780(d), this Declaration is submitted in support of the Selection of Venue for the Trial of Plaintiff Alana Gutierrez's Cause of Action alleging violation of California's Consumers Legal Remedies Act.

3. Plaintiff Gutierrez is and at all relevant times was, a California citizen who resides in Shingle Springs, California.

4. Based on the facts set forth herein, this Court is a proper venue for the prosecution of Plaintiff's Cause of Action alleging violation of California's Consumers Legal Remedies Act because and a substantial portion of the events giving rise to the Gutierrez's claims occurred in Eastern District of California.

5. I declare under penalty of perjury under the laws of California and the United States of America that the foregoing is true and correct.

Executed on September 5, 2024, in Fullerton, California.



Laura E. Goolsby